

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
KENNETH JAMES WRIGHT	:	VIOLATIONS:
	:	18 U.S.C. § 2113(a) (bank robbery –
	:	4 counts)
	:	18 U.S.C. § 2113(d) (armed bank robbery –
	:	2 counts)
		18 U.S.C. § 2 (aiding and abetting)

I N F O R M A T I O N

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about November 18, 2003, at Fairless Hills, Pennsylvania, in the Eastern District of Pennsylvania, defendant

KENNETH JAMES WRIGHT

knowingly, by force and violence, and by intimidation, took, and did aid and abet the taking, from employees of Wachovia Bank, 951 Trenton Road, United States currency, that is, approximately \$1,967 belonging to, and in the care, custody, control, management, and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about January 3, 2004, at Bristol Township, Pennsylvania, in the Eastern District of Pennsylvania, defendant

KENNETH JAMES WRIGHT

knowingly, by force and violence, and by intimidation, took from employees of Fleet Bank, 503 Oxford Valley Road, United States currency, that is, approximately \$5,419 belonging to, and in the care, custody, control, management, and possession of Fleet Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and in doing so, did knowingly assault and put in jeopardy the lives of the employees of Fleet Bank and other persons by the use of a dangerous weapon, that is, a simulated handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about January 21, 2004, at Bensalem, Pennsylvania, in the Eastern District of Pennsylvania, defendant

KENNETH JAMES WRIGHT

knowingly, by force and violence, and by intimidation, took from employees of Wachovia Bank, 2349 Street Road, United States currency, that is, approximately \$8,719 belonging to, and in the care, custody, control, management, and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and in doing so, did knowingly assault and put in jeopardy the lives of the employees of Wachovia Bank and other persons by the use of a dangerous weapon, that is, a simulated handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about February 2, 2004, at Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

KENNETH JAMES WRIGHT

knowingly, by force and violence, and by intimidation, took from employees of Citizens Bank, 195 Franklin Mills Boulevard, United States currency, that is, approximately \$2,000 belonging to, and in the care, custody, control, management, and possession of Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about February 4, 2004, at Fairless Hills, Pennsylvania, in the Eastern District of Pennsylvania, defendant

KENNETH JAMES WRIGHT

knowingly, by force and violence, and by intimidation, took from employees of Fleet Bank, 500 Lincoln Highway, United States currency, that is, approximately \$1,690 belonging to, and in the care, custody, control, management, and possession of Fleet Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about February 27, 2004, at Fairless Hills, Pennsylvania, in the Eastern District of Pennsylvania, defendant

KENNETH JAMES WRIGHT

knowingly, by force and violence, and by intimidation, took from employees of Wachovia Bank, 951 Trenton Road, United States currency, that is, approximately \$2,863 belonging to, and in the care, custody, control, management, and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

PATRICK L. MEEHAN
United States Attorney